

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF BIG RIVERS ELECTRIC	)	
CORPORATION FOR APPROVAL OF	)	CASE NO.
ELECTRICAL INTERCONNECTION SERVICE TO	)	2005-00300
THOROUGHBRED GENERATING COMPANY,	)	
LLC	)	

FIRST DATA REQUEST OF COMMISSION STAFF

The Big Rivers Electric Corporation (“Big Rivers”), pursuant to 807 KAR 5:001, is to file with the Commission the original and five copies of the following information, with a copy to all parties of record. The information requested herein is due within 14 days of the date of this request. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request. Big Rivers shall include in each response the name of the individual(s) who provided the information needed or responded to the data request.

1. Refer to Exhibit 1 of the Application, page 9. Concerning the provisions contained in Article 2.1 of the Interconnection and Operating Agreement (“IOA”):

a. Has Big Rivers sought the approval of the Rural Utilities Service (“RUS”)? If yes, provide a copy of the request to RUS.

b. Has Big Rivers received RUS approval of the IOA?

(1) If yes, provide a copy of the approval letter from RUS.

(2) If no, indicate when Big Rivers anticipates it will receive RUS approval.

2. Refer to Exhibit 1 of the Application, page 12, Article 2.4.2. Explain the purpose of the following section of Article 2.4.2:

In the event the KPSC approves Provider’s application for authorization to take ownership of unfinished Network Upgrades but grants Provider rate treatment that will not permit Provider to reimburse Customer its costs of constructing such unfinished Network Upgrades and Customer’s cost of maintaining such Network Upgrades through the date they are transferred to Provider’s ownership, Customer may refuse to transfer such Network Upgrades to Provider, in which case Customer will bear Provider’s costs of obtaining the foregoing approvals and rate treatment from the KPSC.

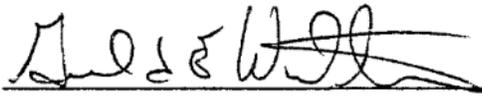
3. Refer to Exhibit 1 of the Application, page 30, Article 4.9.3. Indicate which party will be responsible for any costs resulting from a planned or unplanned outage.

4. Refer to Exhibit 1 of the Application, page 43, Article 9.2. Which party determines that upgrades are necessary to comply with Good Utility Practice? Does the agreement provide for an arbitration process?

5. Refer to Exhibit 1 of the Application, Appendix G. Provide a breakdown of the estimated \$100,000 in costs Big Rivers expects to incur to provide oversight with respect to design, construction, and installation of the proposed interconnection facilities.

6. Refer to Exhibit 1 of the Application, Appendix I. Provide a breakdown of the \$50,000 in O & M security obligations Big Rivers estimates it will incur.

7. Article 15 of the IOA requires the customer to obtain and maintain several insurance policies. What is the remedy if it fails to do so?

for:   
Beth O'Donnell  
Executive Director  
Public Service Commission  
P.O. Box 615  
Frankfort, KY 40602

Dated: September 12, 2005

cc: Parties of Record